

# PK||LAW

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May 8, 2020

The Honorable Paula Xinis  
6500 Cherrywood Lane  
Suite 400  
Greenbelt, MD 20770

**Re: Henson v. Parikh**  
**Case No. 8:20-CV-00062-PX**

Dear Judge Xinis:

Per your order, the parties have conferred regarding discovery scheduling in this case and jointly propose the following dates to be adopted by the Court via scheduling order. The dates reflect the parties' best guess when discovery could effectively be conducted given the defendant physician and experts on both sides are Emergency Department physicians and in light of the current Covid situation. The dates may require additional adjustment depending on whether and when that challenge is resolved:

**May 21, 2020:** Joint request for early settlement/ ADR conference (This request will not postpone discovery unless otherwise ordered.)

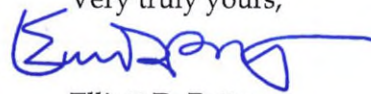
**May 21, 2020:** Initial report whether there is unanimous consent to proceed before a United States Magistrate Judge

**May 21, 2020:** Deadline for conference about discovery of electronically stored information. (If either or both parties intend to take such discovery, before the conference counsel should review the Principles for the Discovery of Electronically Stored Information in Civil Cases prepared by a Joint bench/bar committee published on the court's website.)

**July 21, 2020:** Moving for joinder of additional parties and amendment of pleadings

**November 15, 2020:** Plaintiff's Rule 26(a)(2) disclosures  
**February 15, 2021:** Defendant's Rule 26(a)(2) disclosures  
**March 15, 2021:** Plaintiff's rebuttal Rule 26(a)(2) disclosures  
**April 5, 2021:** Rule 26(e)(2) supplementation of disclosures and responses  
**May 21, 2021:** Discovery deadline; submission of status report  
**June 1, 2021:** Requests for admission  
**July 15, 2021:** Dispositive pretrial motions deadline.

We hope you and your staff are well. Please contact me should you require any additional information.

Very truly yours,  
  
Elliott D. Petty

EPD/dca

Cc: Kelly R. Reed, Esq.  
Stephen G. Skinner